

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant,

V.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER, AND
MELANIE MONTGOMERY**

Defendants.

Case No. 3:19-cv-02074-G

**APPENDIX IN SUPPORT OF ACKERMAN MCQUEEN, INC.'S RESPONSE TO THE
NATIONAL RIFLE ASSOCIATION OF AMERICA'S MOTION TO COMPEL
CERTAIN DOCUMENTS WITHHELD UNDER DEFICIENT CLAIMS OF PRIVILEGE**

Defendant/Counter-Plaintiff Ackerman McQueen, Inc. (“**AMc**”) and the National Rifle Association of America (the “**NRA**”) (together, the “**Parties**”) offer the following evidence in support of *Response to the NRA’s Motion to Compel Certain Documents Withheld Under Deficient Claims of Privilege* (the “**Motion**”).

EX	DESCRIPTION	APPX
A.	Declaration of Brian E. Mason	APP001-APP008
A-1	Email from K. Taylor to A. Allegretto, dated December 3, 2020.	APP009
A-2	Email from K. Taylor to A. Allegretto, dated December 9, 2020.	APP010

A-3	AMc's Privilege Log, dated December 9, 2020.	APP011-APP049
A-4	Letter from B. Mason to NRA Counsel, dated July 7, 2021.	APP050-APP052
A-5	Email from S. Rogers to B. Mason, dated July 19, 2021.	APP053-APP057
A-6	Email from William A. Brewer to Jay Madrid (AMcTX-00065477) dated May 2, 2018 (<i>filed under seal</i>).	APP058
A-7	Email from William A. Brewer to Jay Madrid (AMcTX-00065542) dated May 12, 2018 (<i>filed under seal</i>).	APP059-APP060
A-8	Email from William A. Brewer to Jay Madrid (AMcTX-00065544) dated May 16, 2018 (<i>filed under seal</i>).	APP061-APP063
A-9	Email from William A. Brewer to Jay Madrid (AMcTX-00065615) dated May 23, 2018 (<i>filed under seal</i>).	APP064-APP067
A-10	Email from William A. Brewer to Jay Madrid (AMcTX-00065639) dated July 2, 2018 (<i>filed under seal</i>).	APP068-APP070
A-11	Email from Sarah Rogers to John Frazer (NRA-AMc_00057268) dated September 14, 2018 (<i>filed under seal</i>).	APP071-APP072
A-12	Email from Gina Betts to Sarah Rogers (NRA-AMc_00057270) dated September 14, 2018 (<i>filed under seal</i>).	APP073-APP074
A-13	Email from Gina Betts to Sarah Rogers (NRA-AMc_00057274) dated September 14, 2018 (<i>filed under seal</i>).	APP075-APP076
A-14	Email from Sarah Rogers to Gina Betts (NRA-AMc_00057276) dated September 14, 2018 (<i>filed under seal</i>).	APP077-APP078
A-15	Email from John Frazer to Gina Betts (NRA-AMc_00057281) dated September 14, 2018 (<i>filed under seal</i>).	APP079-APP082
A-16	Email from Gina Betts to John Frazer (AMcTX-00000395) dated January 31, 2019 (<i>filed under seal</i>).	APP083-APP087
A-17	Email from Gina Betts to John Frazer (AMcTX-00000400) dated February 3, 2019 (<i>filed under seal</i>).	APP088-APP092
A-18	Email from Bill Winkler to Jessica Bradley (AMc-057923) dated February 8, 2019 (<i>filed under seal</i>).	APP093-APP095

A-19	Letter from S. Rogers to B. Mason, dated October 15, 2021.	APP096-APP099
A-20	Letter from B. Mason to S. Rogers and C. Fanelli, dated October 22, 2021.	APP100-APP101
A-21	Draft letter to Wayne LaPierre from Angus McQueen, attached to an email from Ariana Azimi to Revan McQueen (AMc-058564) dated September 24, 2018 (<i>filed under seal</i>).	APP102-APP110

Dated: November 19, 2021

Respectfully submitted,

/s/ Brian E. Mason

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically served via the Court's electronic case filing system upon all counsel of record on November 19, 2021.

Brian E. Mason

Brian E. Mason

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant,

V.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER, AND
MELANIE MONTGOMERY**

Defendants.

Case No. 3:19-cv-02074-G

DECLARATION OF BRIAN E. MASON

Pursuant to 28 U.S.C. § 1746, I, Brian E. Mason, hereby declare as follows:

1. My name is Brian E. Mason. I am over eighteen years of age. I have never been convicted of a felony or misdemeanor involving moral turpitude. I am fully competent to make this Declaration. I am a partner at Dorsey & Whitney, LLP (“**Dorsey**”) and counsel of record for Ackerman McQueen, Inc. (“**AMc**”), Mercury Group, Inc., Henry Martin, William Winkler, and Melanie Montgomery in the matter of *National Rifle Association of America v. Ackerman McQueen, et al.*, No. 3:19-cv-02074-G, currently pending in the Northern District of Texas (the “**Texas Action**”). I am also admitted *pro hac vice* representing AMc and Mercury Group in the following lawsuits in Virginia: *National Rifle Association of America v. Ackerman McQueen, Inc., et al.*, Case Nos. CL19002067, CL19001757, and CL19002886, in the Circuit Court for the City of Alexandria, Virginia (collectively, the “**Virginia Action**”), which have now been stayed pending

the outcome of the Texas Action. I am also admitted in the Bankruptcy Court of the Northern District of Texas and served as counsel of record for AMc in the bankruptcy matter *In re National Rifle Association*, No. 21-30085-hdh11 (Bkr. N.D. Tex. Jan. 15, 2021) (“**NRA Bankruptcy**”). I have personal knowledge of the facts set forth in this Declaration and acknowledge them to be true and correct.

2. AMc served its privilege log on the NRA on December 9, 2020 (“**Original Privilege Log**”). At the time, AMc had just completed briefing its opposition to the NRA’s motion to transfer before the Judicial Panel on Multidistrict Litigation. On January 15, 2021, the NRA filed the NRA Bankruptcy. Pursuant to this Court’s order (ECF 200), the NRA Bankruptcy stayed AMc’s litigation against the NRA, but did not prohibit the NRA from continuing to pursue its claims against AMc or otherwise engage in discovery activities.

3. After the NRA Bankruptcy was dismissed in May 2021, the parties resumed litigation under the Court’s applicable scheduling order, which established the discovery deadline of August 6, 2021.

4. On August 17, 2021—eleven days after the August 6, 2021 discovery deadline and over eight months after AMc served its Original Privilege Log—AMc received a letter from NRA counsel complaining about AMc’s Original Privilege Log for the first time. In that letter, the NRA raised two issues related to the sufficiency of the existing privilege descriptions on the Original Privilege Log with regard to attorney-client and work product privileges.

5. On September 1, 2021, AMc received an email from NRA counsel again regarding the Original Privilege Log. This time, the NRA included a draft motion to compel of a joint status report relating to the Original Privilege Log and demanded that AMc complete its responsive portion within ten calendar days. Like the August 17, 2021 letter, the joint status report only

addressed the NRA's complaints about the existing entries listed on AMc's Original Privilege Log.

6. On September 7, 2021 (after the Court reviewed the parties' status reports on the litigation), the Court extended the discovery deadline from August 6, 2021 to October 29, 2021. Shortly thereafter, Dorsey conferred with counsel for the NRA regarding the concerns raised in its August 17, 2021 letter about AMc's Original Privilege Log. During that conference, the NRA's counsel raised no concerns other than those previously raised with regard to AMc's Original Privilege Log. In an attempt to address the NRA's concerns in good faith, AMc amended and served its privilege log on September 21, 2021 ("***First Amended Privilege Log***"), which included greater detail regarding AMc's privilege descriptions and mirrored the form of privilege descriptions used by the NRA in its privilege log—to which the NRA would presumably not object. AMc also produced approximately one dozen documents that it agreed to remove from its privilege log altogether.

7. On September 22, 2021, the NRA sent another letter to AMc, which for the first time suggested that certain categories of communications might be missing from AMc's Original Privilege Log—an issue that had not been raised at any time during the preceding nine months. Shortly thereafter, the parties held another meet and confer conference on October 6, 2021 to discuss numerous discovery issues, including the NRA's concerns regarding AMc's First Amended Privilege Log and the NRA's September 22, 2021 correspondence.

8. Following this conference, Dorsey continued to investigate the NRA's concerns. During this process, on or about October 13, 2021, Dorsey came to learn that AMc's Original Privilege Log had inadvertently excluded certain privileged communications due to a coding misapplication by the e-discovery vendor. Specifically, in order to expedite the review of the large volume of documents collected from AMc custodians certain privileged documents were reviewed

and coded separately from the documents in the main document database, which included documents responsive not only to discovery requests in the Texas Action, but documents relevant to the NRA's three additional lawsuits against AMc in the Virginia Action.

9. Following an initial review in January 2020, AMc's counsel then conducted a second-level review of documents specifically relevant to the Texas Action throughout the summer of 2020. During this process, the coding originally used for the previously segregated privileged documents was not properly applied by the e-discovery vendor to the documents slated for second-level review for the Texas Action. Although some privileged documents were identified during the second-level review, which were included on the Original Privilege Log, the remaining privileged documents were inadvertently omitted. This exclusion was unintentional and not the result of conscious indifference, and no attorney for AMc had knowledge of this omission until October 2021. Had the NRA raised the issue sooner, AMc's counsel could have promptly investigated and resolved the issue.

10. During this same time period, AMc was also in the process of reviewing many thousands of other documents related to AMc's pre-2018 communications related to NRATV and analytics, which the NRA had also complained about during the final weeks before the discovery deadline. In an attempt to accommodate the NRA's demands without the need for intervention by the Court, AMc made weekly supplemental productions from mid-September through the October 29, 2021 discovery deadline. Simultaneously, AMc was also engaged in extensive communications with the NRA concerning access to certain information on AMc's server and NRA social media accounts, completing depositions, and preparing weekly status updates to the Court regarding the parties' discovery activities, among numerous other discovery activities.

11. On or about October 13, 2021, Dorsey began its review of the previously segregated

privilege documents. On October 22, 2021, one week in advance of the October 29, 2021 discovery deadline, AMc served its Second Amended Privilege Log on the NRA, which included the previously omitted entries. The omission of these documents on the prior privilege logs was unintentional, and AMc immediately undertook to address the issue at the point the possibility of omission was discovered. As of the date of this declaration, I believe that AMc's Second Amended Privilege Log is complete and correct to the best of my knowledge.

12. I understand that the NRA has suggested that AMc and/or its counsel somehow corrected the issues with respect to its privilege log after receiving the October 18, 2021 supplemental expert report of Andrew McLean. I further understand that the NRA has alleged that AMc and/or its counsel has "plainly attempted to shield from this Court's view the significant role they played in frustrating the NRA's attempts to retrieve and review its business records." Mr. McLean's purported supplemental expert report had nothing to do with the timing, facts, or circumstances surrounding AMc and its counsel learning that certain entries had been inadvertently not logged. Similarly, neither AMc nor its counsel intentionally or otherwise attempted to hide, misrepresent, or otherwise conceal certain privileged log entries from the NRA or its counsel.

13. After AMc served its Second Amended Privilege Log, the NRA was completely silent with respect to issues it had previously raised. Without making any effort to confer whatsoever, the NRA filed a "joint" motion to compel related to AMc's privilege log and privileged documents at 11:59 p.m. on October 29, 2021. ECF 397.

14. Attached hereto as **Exhibit A-1** is a true and correct copy of an email from K. Taylor to A. Allegretto, dated December 3, 2020.

15. Attached hereto as **Exhibit A-2** is a true and correct copy of an email from

K. Taylor to A. Allegretto, dated December 9, 2020.

16. Attached hereto as **Exhibit A-3** is a true and correct copy of AMc's Privilege Log, dated December 9, 2020.

17. Attached hereto as **Exhibit A-4** is a true and correct copy of a letter from B. Mason to NRA Counsel, dated July 7, 2021.

18. Attached hereto as **Exhibit A-5** is a true and correct copy of an email from S. Rogers to B. Mason, dated July 19, 2021.

19. Attached hereto as **Exhibit A-6** is a true and correct copy of an email from William A. Brewer to Jay Madrid (AMcTX-00065477) dated May 2, 2018 (*filed under seal*).

20. Attached hereto as **Exhibit A-7** is a true and correct copy of an email from William A. Brewer to Jay Madrid (AMcTX-00065542) dated May 12, 2018 (*filed under seal*).

21. Attached hereto as **Exhibit A-8** is a true and correct copy of an email from William A. Brewer to Jay Madrid (AMcTX-00065544) dated May 16, 2018 (*filed under seal*).

22. Attached hereto as **Exhibit A-9** is a true and correct copy of an email from William A. Brewer to Jay Madrid (AMcTX-00065615) dated May 23, 2018 (*filed under seal*).

23. Attached hereto as **Exhibit A-10** is a true and correct copy of an email from William A. Brewer to Jay Madrid (AMcTX-00065639) dated July 2, 2018 (*filed under seal*).

24. Attached hereto as **Exhibit A-11** is a true and correct copy of an email from Sarah Rogers to John Frazer (NRA-AMc_00057268) dated September 14, 2018 (*filed under seal*).

25. Attached hereto as **Exhibit A-12** is a true and correct copy of an email from Gina Betts to Sarah Rogers (NRA-AMc_00057270) dated September 14, 2018 (*filed under seal*).

26. Attached hereto as **Exhibit A-13** is a true and correct copy of an email from Gina Betts to Sarah Rogers (NRA-AMc_00057274) dated September 14, 2018 (*filed under seal*).

27. Attached hereto as **Exhibit A-14** is a true and correct copy of an email from Sarah Rogers to Gina Betts (NRA-AMc_00057276) dated September 14, 2018 (*filed under seal*).

28. Attached hereto as **Exhibit A-15** is a true and correct copy of an email from John Frazer to Gina Betts (NRA-AMc_00057281) dated September 14, 2018 (*filed under seal*).

29. Attached hereto as **Exhibit A-16** is a true and correct copy of an email from Gina Betts to John Frazer (AMcTX-00000395) dated January 31, 2019 (*filed under seal*).

30. Attached hereto as **Exhibit A-17** is a true and correct copy of an email from Gina Betts to John Frazer (AMcTX-00000400) dated February 3, 2019 (*filed under seal*).

31. Attached hereto as **Exhibit A-18** is a true and correct copy of an email from Bill Winkler to Jessica Bradley (AMc-057923) dated February 8, 2019 (*filed under seal*).

32. Attached hereto as **Exhibit A-19** is a true and correct copy of a letter from S. Rogers to B. Mason, dated October 15, 2021.

33. Attached hereto as **Exhibit A-20** is a true and correct copy of a letter from B. Mason to S. Rogers and C. Fanelli, dated October 22, 2021.

34. Attached hereto as **Exhibit A-21** is a true and correct copy of a draft letter to Wayne LaPierre from Angus McQueen, attached to an email from Ariana Azimi to Revan McQueen (AMc-058564) dated September 24, 2018 (*filed under seal*).

Executed this 19th day of November, 2021.

/s/ Brian E. Mason
Brian E. Mason

EXHIBIT A-1

Taylor, Kelsey

From: Taylor, Kelsey
Sent: Thursday, December 3, 2020 11:03 AM
To: Alessandra Allegretto; Claudia Colon Garcia-Moliner; Michael Collins
Cc: Mason, Brian; Carroll, Christina
Subject: Document Subpoena and Privilege Logs

Hi Ally,

Based on our previous discussions in October, you indicated that the Brewer Firm was going to be producing documents, subject to its objections, in response to the subpoena issued on August 24. Please let us know when we can expect that document production and accompanying privilege log.

With regard to the privilege logs for the NRA and AMc's prior document productions, we will be ready to exchange privilege logs on Wednesday, December 9, 2020. Please let me know if this is agreeable to you.

Thanks,
Kelsey

Kelsey M. Taylor
Associate



DORSEY & WHITNEY LLP
300 Crescent Ct, Suite 400 | Dallas, TX 75201
P: 214.981.9981 F: 214.853.5607 C: 979.575.4026

EXHIBIT A-2

Taylor, Kelsey

From: Taylor, Kelsey
Sent: Wednesday, December 9, 2020 5:08 PM
To: 'Alessandra Allegretto'; Claudia Colon Garcia-Moliner; Michael Collins
Cc: Mason, Brian; Carroll, Christina
Subject: AMc Privilege Log
Attachments: 2020-12-09 AMc Privilege Log.pdf

Hi Ally,
Attached, please find AMc's privilege log reflecting documents withheld from AMc's prior document productions.
If you have any questions, please let me know.

Thank you,
Kelsey

Kelsey M. Taylor

Associate



DORSEY & WHITNEY LLP
300 Crescent Ct, Suite 400 | Dallas, TX 75201
P: 214.981.9981 F: 214.853.5607 C: 979.575.4026

EXHIBIT A-3

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
001	Attorney-Client	Message	1/10/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Julie Rubash <JRubash@sheppardmullin.com>	Revan McQueen <Revan-McQueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>		New Independent Contractor	Ccommunications with counsel regarding contract negotiation for NRA commentator, Dan Bongino
002	Attorney-Client	Message_Attachment	1/10/2018						Communications with counsel regarding contract negotiation for NRA commentator, Dan Bongino
003	Forwarding Attorney-Client Communications	Message	1/15/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>; Brandon Winkler<Brandon-Winkler@am.com>	Revan McQueen <Revan-McQueen@am.com>; Ariana Azimi <ariana-azimi@am.com>		FW: Dan Bongino Talent Agreement	Communications with counsel regarding contract negotiation for NRA commentator, Dan Bongino
004	Forwarding Attorney-Client Communications	Message_Attachment	1/15/2018						Communications with counsel regarding contract negotiation for NRA commentator, Dan Bongino
005	Forwarding Attorney-Client Communications	Message_Attachment	1/15/2018						Communications with counsel regarding contract negotiation for NRA commentator, Dan Bongino
006	Work Product	Message	3/28/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>			Fwd: Attorney Bill Brewer -- information requests	Communication regarding engaging counsel to assist with information requests.
007	Attorney-Client	Message	3/29/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>				Communications regarding NRA request for documents and response to same upon advice of counsel.
008	Attorney-Client	Message_Attachment	3/29/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
009	Attorney-Client	Message	3/29/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>; Revan McQueen <Revan-McQueen@am.com>; "Lacey (Duffy) Cremer" <lacey-cremer@am.com>		Brewer	Communications regarding NRA request for documents and response to same upon advice of counsel.
010	Attorney-Client	Message	3/29/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>; Revan McQueen <Revan-McQueen@am.com>; "Lacey (Duffy) Cremer" <lacey-cremer@am.com>		Brewer	Communications regarding NRA request for documents and response to same upon advice of counsel.
011	Attorney-Client	Message	4/4/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; "Lacey (Duffy) Cremer"<lacey-cremer@am.com>; Bill Winkler <bill-winkler@am.com>		Re: Follow-up: Information Request	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
012	Forwarding Attorney-Client Communications	Message	4/4/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Revan McQueen <Revan-McQueen@am.com>; Bill Winkler <bill-winkler@am.com>; "Lacey (Duffy) Cremer" <lacey-@am.com>			Fwd: Ackerman	Communications regarding NRA request for documents and response to same upon advice of counsel.
013	Attorney-Client	Message	4/26/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>			RE:	Communications regarding NRA request for documents and response to same upon advice of counsel.
014	Attorney-Client	Message	4/26/2018	<betts.gina@dorsey.com>	<Melanie-Montgomery@am.com>; <bill-winkler@am.com>			PRIVILEGED AND CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications regarding NRA request for documents and response to same upon advice of counsel.
015	Attorney-Client	Message_Attachment	4/26/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
016	Attorney-Client	Message	4/26/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>		Existing Contract	Communications with counsel regarding negotiation of Oliver North's contract.
017	attorney-Client	Message	4/26/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>		Existing Contract	Communications with counsel regarding negotiation of Oliver North's contract.
018	Attorney-Client	Message	4/26/2018	<betts.gina@dorsey.com>	<Melanie-Montgomery@am.com>	<bill-winkler@am.com>		Re: Existing Contract	Communications with counsel regarding negotiation of Oliver North's contract.
019	Attorney-Client	Message_Attachment	4/26/2018						Communications with counsel regarding negotiation of Oliver North's contract.
020	Attorney-Client	Message	4/26/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>		Re: Existing Contract	Communications with counsel regarding negotiation of Oliver North's contract.
021	Attorney-Client	Message	4/26/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>		Re: Existing Contract	Communications with counsel regarding negotiation of Oliver North's contract.
022	Attorney-Client	Message	4/26/2018	<betts.gina@dorsey.com>	<Melanie-Montgomery@am.com>	<bill-winkler@am.com>		Re: Existing Contract	Communications with counsel regarding negotiation of Oliver North's contract.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
023	Attorney-Client	Message_Attachment	4/26/2018						Communications with counsel regarding negotiation of Oliver North's contract.
024	Attorney-Client	Message	4/26/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>		Re: Existing Contract	Communications with counsel regarding negotiation of Oliver North's contract.
025	Attorney-Client	Message	4/26/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>		Re: Existing Contract	Communications with counsel regarding negotiation of Oliver North's contract.
026	Attorney-Client	Message	4/26/2018	Bill Winkler <bill-winkler@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>			RE: Existing Contract	Communications reflecting advice of counsel regarding negotiation of Oliver North's contract.
027	Attorney-Client	Message	4/26/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>			Re: Existing Contract	Communications reflecting advice of counsel regarding negotiation of Oliver North's contract.
028	Attorney-Client	Message	4/27/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Brandon Winkler<Brandon-Winkler@am.com>		back in office	Communications with counsel regarding negotiation of Oliver North's contract.
029	Attorney-Client	Message	4/27/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Brandon Winkler<Brandon-Winkler@am.com>		back in office	Communications with counsel regarding negotiation of Oliver North's contract.
030	Attorney-Client	Message	4/27/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>	<Melanie-Montgomery@am.com>; <Brandon-Winkler@am.com>		Re: back in office	Communications with counsel regarding negotiation of Oliver North's contract.
031	Attorney-Client	Message_Attachment	4/27/2018						Communications with counsel regarding negotiation of Oliver North's contract.
032	Attorney-Client	Message	4/27/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Melanie Montgomery <Melanie-Montgomery@am.com>		RE: back in office	Communications with counsel regarding negotiation of Oliver North's contract.
033	Attorney-Client	Message	4/27/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Melanie Montgomery <Melanie-Montgomery@am.com>		RE: back in office	Communications with counsel regarding negotiation of Oliver North's contract.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
034	Attorney-Client	Message	4/27/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>	<Melanie-Montgomery@am.com>		Re: back in office	Communications with counsel regarding negotiation of Oliver North's contract.
035	Attorney-Client	Message_Attachment	4/27/2018						Communications with counsel regarding negotiation of Oliver North's contract.
036	Attorney-Client	Message	4/27/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>; Bill Winkler <bill-winkler@am.com>			Re: back in office	Communications with counsel regarding negotiation of Oliver North's contract.
037	Attorney-Client	Message	4/27/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>; Bill Winkler <bill-winkler@am.com>			Re: back in office	Communications with counsel regarding negotiation of Oliver North's contract.
038	Attorney-Client	Message	4/27/2018	<barton.casey@dorsey.com>	<bill-winkler@am.com>; <melanie-montgomery@am.com>			PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
039	Attorney-Client	Message_Attachment	4/27/2018						Communications with counsel regarding negotiation of Oliver North's contract.
040	Attorney-Client	Message	4/27/2018	<barton.casey@dorsey.com>	<Melanie-Montgomery@am.com>; <bill-winkler@am.com>			RE: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
041	Attorney-Client	Message_Attachment	4/27/2018						Communications with counsel regarding negotiation of Oliver North's contract.
042	Attorney-Client	Message	4/27/2018	Bill Winkler <bill-winkler@am.com>	"barton.casey@dorsey.com" <barton.casey@dorsey.com>; Melanie Montgomery<Melanie-Montgomery@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>		RE: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
043	Attorney-Client	Message	4/27/2018	Bill Winkler <bill-winkler@am.com>	"barton.casey@dorsey.com" <barton.casey@dorsey.com>; Melanie Montgomery<Melanie-Montgomery@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>		RE: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
044	Attorney-Client	Message	4/27/2018	<barton.casey@dorsey.com>	<bill-winkler@am.com>; <Melanie-Montgomery@am.com>	<betts.gina@dorsey.com>		RE: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
045	Attorney-Client	Message_Attachment	4/27/2018						Communications with counsel regarding negotiation of Oliver North's contract.
046	Attorney-Client	Message	4/27/2018	Bill Winkler <bill-winkler@am.com>	"barton.casey@dorsey.com" <barton.casey@dorsey.com>; Melanie Montgomery<Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>		RE: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
047	Attorney-Client	Message	4/27/2018	Bill Winkler <bill-winkler@am.com>	"barton.casey@dorsey.com" <barton.casey@dorsey.com>; Melanie Montgomery<Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>		RE: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
048	Attorney-Client	Message	4/27/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>		FW: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
049	Attorney-Client	Message_Attachment	4/27/2018						Communications with counsel regarding negotiation of Oliver North's contract.
050	Attorney-Client	Message	4/27/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>		FW: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
051	Attorney-Client	Message_Attachment	4/27/2018						Communications with counsel regarding negotiation of Oliver North's contract.
052	Attorney-Client	Message	4/27/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>			FW: PRIVILEGED & CONFIDENTIAL ATTORNEY-CLIENT CORRESPONDENCE	Communications with counsel regarding negotiation of Oliver North's contract.
053	Attorney-Client	Message	5/7/2018	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Bill Winkler<bill-winkler@am.com>; "betts.gina@dorsey.com"		Re: Complaint.pdf	Communications with counsel regarding Lockton matter and Carry Guard allegations.
054	Attorney-Client	Message	5/7/2018	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Bill Winkler<bill-winkler@am.com>; "betts.gina@dorsey.com"		Re: Complaint.pdf	Communications with counsel regarding Lockton matter and Carry Guard allegations.
055	Attorney-Client	Message	5/7/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>; Revan McQueen <Revan-McQueen@am.com>		North Contract	Communications with counsel regarding negotiation of Oliver North's contract.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
056	Attorney-Client	Message	5/7/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Bill Winkler <bill-winkler@am.com>; Revan McQueen <Revan-McQueen@am.com>		North Contract	Communications with counsel regarding negotiation of Oliver North's contract.
057	Attorney-Client	Message	5/9/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>			FW: Real Estate Follow Up	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
058	Attorney-Client	Message	5/9/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			Re: Real Estate Follow Up	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
059	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
060	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
061	Attorney-Client	Message	5/9/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>			FW: Vaquero PDF	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
062	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
063	Attorney-Client	Message	5/9/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>				Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
064	Attorney-Client	Message	5/9/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>			Re:	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
065	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
066	Attorney-Client	Message	5/9/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			FW: Ackerman - Consulting Agreement	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
067	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
068	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
069	Attorney-Client	Message	5/9/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Melanie Montgomery <Melanie-Montgomery@am.com>		RE: Ackerman - Consulting Agreement	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
070	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
071	Attorney-Client	Message	5/9/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Melanie Montgomery <Melanie-Montgomery@am.com>		RE: Ackerman - Consulting Agreement	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
072	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
073	Attorney-Client	Message	5/9/2018	Bill Winkler <bill-winkler@am.com>	Brandon Winkler <Brandon-Winkler@am.com>			FW: Ackerman - Consulting Agreement	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
074	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
075	Attorney-Client	Message	5/9/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			RE: Ackerman - Consulting Agreement	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
076	Attorney-Client	Message	5/9/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>			RE: Ackerman - Consulting Agreement	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
077	Attorney-Client	Message	5/9/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			RE: Ackerman - Consulting Agreement	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
078	Attorney-Client	Message	5/9/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			Fwd: RE:	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
079	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
080	Attorney-Client	Message_Attachment	5/9/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
081	Attorney-Client	Message	5/10/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>			RE: RE:	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
082	Attorney-Client	Message	5/10/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>			any updates	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
083	Attorney-Client	Message	5/10/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			RE: any updates	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
084	Attorney-Client	Message	5/10/2018	<betts.gina@dorsey.com>	<madrid.jay@dorsey.com>; <Revan-McQueen@am.com>; <bill-winkler@am.com>			FW: Ackerman - Employment Agreement	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
085	Attorney-Client	Message	5/10/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			Re: do we have an update on how your research is coming	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
086	Attorney-Client	Message_Attachment	5/10/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
087	Attorney-Client	Message	5/10/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>			Re: do we have an update on how your research is coming	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
088	Attorney-Client	Message	5/10/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			Re: do we have an update on how your research is coming	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
089	Attorney-Client	Message_Attachment	5/10/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
090	Attorney-Client	Message	5/11/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>		RE: Ackerman McQueen documents-- CONFIDENTIAL	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
091	Attorney-Client	Message	5/11/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>		RE: Ackerman McQueen documents-- CONFIDENTIAL	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
092	Attorney-Client	Message	5/11/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			Ackerman Documents-- CONFIDENTIAL	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
093	Attorney-Client	Message_Attachment	5/11/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
094	Attorney-Client	Message_Attachment	5/11/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
095	Attorney-Client	Message_Attachment	5/11/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
096	Attorney-Client	Message	5/11/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>			FW: PDF's	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
097	Attorney-Client	Message_Attachment	5/11/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
098	Attorney-Client	Message	5/11/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			RE: PDF's	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
099	Attorney-Client	Message	5/11/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>			RE: PDF's	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
100	Attorney-Client	Message	5/11/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>			Re: PDF's	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
101	Attorney-Client	Message_Attachment	5/11/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
102	Attorney-Client	Message_Attachment	5/11/2018						Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
103	Attorney-Client	Message	5/11/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			RE: PDF's	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
104	Attorney-Client	Message	5/14/2018	<betts.gina@dorsey.com>	<Revan-McQueen@am.com>; <bill-winkler@am.com>; <Melanie-Montgomery@am.com>			FW: Emailing: Ackerman McQueen - Oliver North Agreement.PDF	Communications with counsel regarding negotiation of Oliver North's contract.
105	Attorney-Client	Message_Attachment	5/14/2018						Communications with counsel regarding negotiation of Oliver North's contract.
106	Attorney-Client	Message	5/14/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Bill Winkler <bill-winkler@am.com>; Ariana Azimi <ariana-azimi@am.com>		Re: Emailing: Ackerman McQueen - Oliver North Agreement.PDF	Communications with counsel regarding negotiation of Oliver North's contract.
107	Attorney-Client	Message	5/14/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Bill Winkler <bill-winkler@am.com>; Ariana Azimi <ariana-azimi@am.com>		Re: Emailing: Ackerman McQueen - Oliver North Agreement.PDF	Communications with counsel regarding negotiation of Oliver North's contract.
108	Attorney-Client	Message	5/14/2018	Ariana Azimi <ariana-azimi@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>; Bill Winkler <bill-winkler@am.com>		Re: Emailing: Ackerman McQueen - Oliver North Agreement.PDF	Communications with counsel regarding negotiation of Oliver North's contract.
109	Attorney-Client	Message_Attachment	5/14/2018						Communications with counsel regarding negotiation of Oliver North's contract.
110	Attorney-Client	Message	5/14/2018	Ariana Azimi <ariana-azimi@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>; Bill Winkler <bill-winkler@am.com>		Re: Emailing: Ackerman McQueen - Oliver North Agreement.PDF	Communications with counsel regarding negotiation of Oliver North's contract.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
111	Attorney-Client	Message_Attachment	5/14/2018						Communications with counsel regarding negotiation of Oliver North's contract.
112	Forwarding Attorney-Client Communications	Message	5/14/2018	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>	Revan McQueen <Revan-McQueen@am.com>; Bill Winkler <bill-winkler@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>		FW: Brewer Interview request	Communications regarding NRA request for documents and response to same upon advice of counsel.
113	Attorney-Client	Message	5/15/2018	Bill Winkler <bill-winkler@am.com>	Brandon Winkler <Brandon-Winkler@am.com>			FW: Emailing: Ackerman McQueen - Oliver North Agreement.PDF	Communications with counsel regarding negotiation of Oliver North's contract.
114	Attorney-Client	Message_Attachment	5/15/2018						Communications with counsel regarding negotiation of Oliver North's contract.
115	Attorney-Client	Message	5/15/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>			WBB	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
116	Attorney-Client	Message	5/15/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			RE: WBB	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
117	Attorney-Client	Message	5/15/2018	Bill Winkler <bill-winkler@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>			RE: WBB	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
118	Attorney-Client	Message	5/15/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>			RE: WBB	Communications with counsel related to Wayne LaPierre's request for AMc to assist with home purchase in Dallas.
119	Attorney-Client	Message	8/8/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>; "madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>; Melanie Montgomery <Melanie-Montgomery@am.com>; "Lacey (Duffy) Cremer" <lacey-cremer@am.com>		FW: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
120	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
121	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
122	Attorney-Client	Message	8/8/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>; "madrid.jay@dorsey.com"	Brandon Winkler <Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>; "Lacey (Duffy) Cremer@am.com"		FW: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
123	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
124	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
125	Attorney-Client	Message	8/8/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>	<betts.gina@dorsey.com>; <Brandon-Winkler@am.com>; <Melanie-Montgomery@am.com>; <lacey-cremer@am.com>		Re: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
126	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
127	Attorney-Client	Message	8/8/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>; "Lacey (Duffy) Cremer@am.com"		RE: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
128	Attorney-Client	Message	8/8/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>; "Lacey (Duffy) Cremer@am.com"		RE: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
129	Attorney-Client	Message	8/8/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>; "madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>; "Lacey (Duffy) Cremer@am.com"		Re: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
130	Attorney-Client	Message	8/8/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>; "madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>; "Lacey (Duffy) Cremer@am.com"		Re: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
131	Attorney-Client	Message	8/8/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>	<betts.gina@dorsey.com>; <Brandon-Winkler@am.com>; <Melanie-Montgomery@am.com>; <lacey-cremer@am.com>		Re: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
132	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
133	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
134	Attorney-Client	Message	8/8/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>	<madrid.jay@dorsey.com>; <Brandon-Winkler@am.com>; <Melanie-Montgomery@am.com>; <lacey-cremer@am.com>		Re: 2018.08.07 WP Ltr to AMc Contract Compliance.docx	Communications regarding NRA request for documents and response to same upon advice of counsel.
135	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
136	Attorney-Client	Message_Attachment	8/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
137	Attorney-Client	Message	8/8/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Bill Winkler <bill-winkler@am.com>		Conversation Summary	Communications regarding NRA request for documents and response to same upon advice of counsel.
138	Attorney-Client	Message	8/8/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Bill Winkler <bill-winkler@am.com>		Conversation Summary	Communications regarding NRA request for documents and response to same upon advice of counsel.
139	Forwarding Attorney-Client Communication	Message	8/9/2018	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>				Communications regarding NRA request for documents and response to same upon advice of counsel.
140	Forwarding Attorney-Client Communications	Message	8/9/2018	Bill Winkler <bill-winkler@am.com>	Brandon Winkler <Brandon-Winkler@am.com>			FW: Conversation Summary	Communications regarding NRA request for documents and response to same upon advice of counsel.
141	Attorney-Client	Message	8/13/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Gina Betts <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>		Response To W. Phillips Procedures Document	Communications regarding NRA request for documents and response to same upon advice of counsel.
142	Attorney-Client	Message_Attachment	8/13/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
143	Attorney-Client	Message_Attachment	8/13/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
144	Attorney-Client	Message	8/13/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>	<Revan-McQueen@am.com>; <betts.gina@dorsey.com>		FW: Letter to Wilson Phillips	Communications regarding NRA request for documents and response to same upon advice of counsel.
145	Attorney-Client	Message_Attachment	8/13/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
146	Attorney-Client	Message	8/13/2018	Bill Winkler <bill-winkler@am.com>	Brandon Winkler <Brandon-Winkler@am.com>			FW: Letter to Wilson Phillips	Communications regarding NRA request for documents and response to same upon advice of counsel.
147	Attorney-Client	Message_Attachment	8/13/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
148	Attorney-Client	Message	8/13/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; "betts.gina@dorsey.com"<betts.gina@dorsey.com>		RE: Letter to Wilson Phillips	Communications regarding NRA request for documents and response to same upon advice of counsel.
149	Attorney-Client	Message	8/13/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; "betts.gina@dorsey.com"<betts.gina@dorsey.com>		RE: Letter to Wilson Phillips	Communications regarding NRA request for documents and response to same upon advice of counsel.
150	Attorney-Client	Message	8/13/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>	<Revan-McQueen@am.com>; <betts.gina@dorsey.com>		RE: Letter to Wilson Phillips	Communications regarding NRA request for documents and response to same upon advice of counsel.
151	Attorney-Client	Message	8/14/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>	<Revan-McQueen@am.com>; <betts.gina@dorsey.com>		FW: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.
152	Attorney-Client	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
153	Attorney-Client	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
154	Attorney-Client	Message	8/14/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Gina Betts <betts.gina@dorsey.com>; Angus McQueen <angus-mcqueen@am.com>; Revan		FW: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
155	Attorney-Client	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
156	Attorney-Client	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
157	Attorney-Client	Message	8/14/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Gina Betts <betts.gina@dorsey.com>; Angus McQueen <angus-mcqueen@am.com>; Revan		FW: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.
158	Attorney-Client	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
159	Attorney-Client	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
160	Attorney-Client	Message	8/14/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>; <Melanie-Montgomery@am.com>	<Brandon-Winkler@am.com>; <madrid.jay@dorsey.com>; <betts.gina@dorsey.com>		FW: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.
161	Attorney-Client	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
162	Attorney-Client	Message	8/14/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Melanie Montgomery<Melanie-Montgomery@am.com>	Brandon Winkler <Brandon-Winkler@am.com>; "betts.gina@dorsey.com"<betts.gina@dorsey.com>		RE: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.
163	Attorney-Client	Message	8/14/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Melanie Montgomery<Melanie-Montgomery@am.com>	Brandon Winkler <Brandon-Winkler@am.com>; "betts.gina@dorsey.com"<betts.gina@dorsey.com>		RE: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.
164	Attorney-Client	Message	8/14/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>; <Melanie-Montgomery@am.com>	<Brandon-Winkler@am.com>; <betts.gina@dorsey.com>		RE: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.
165	Forwarding Attorney-Client Communications	Message	8/14/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>			Re: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
166	Forwarding Attorney-Client Communications	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
167	Forwarding Attorney-Client Communications	Message	8/14/2018	Bill Winkler <bill-winkler@am.com>	Angus McQueen <angus-mcqueen@am.com>	Brandon Winkler <Brandon-Winkler@am.com>		FW: Letter	Communications regarding NRA request for documents and response to same upon advice of counsel.
168	Forwarding Attorney-Client Communications	Message_Attachment	8/14/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
169	Attorney-Client	Message	8/15/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>		Letter/memo with changes attached	Communications regarding NRA request for documents and response to same upon advice of counsel.
170	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
171	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
172	Attorney-Client	Message	8/15/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>		Letter/memo with changes attached	Communications regarding NRA request for documents and response to same upon advice of counsel.
173	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
174	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
175	Attorney-Client	Message	8/15/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>	<Brandon-Winkler@am.com>; <Melanie-Montgomery@am.com>		RE: Letter/memo with changes attached	Communications regarding NRA request for documents and response to same upon advice of counsel.
176	Attorney-Client	Message	8/15/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>		Re: Letter/memo with changes attached	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
177	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
178	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
179	Attorney-Client	Message	8/15/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>		Re: Letter/memo with changes attached	Communications regarding NRA request for documents and response to same upon advice of counsel.
180	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
181	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
182	Attorney-Client	Message	8/15/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>		Re: Letter/memo with changes attached	Communications regarding NRA request for documents and response to same upon advice of counsel.
183	Attorney-Client	Message	8/15/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>		Re: Letter/memo with changes attached	Communications regarding NRA request for documents and response to same upon advice of counsel.
184	Attorney-Client	Message	8/15/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>; <Melanie-Montgomery@am.com>; <Revan-McQueen@am.com>	<madrid.jay@dorsey.com>; <betts.gina@dorsey.com>		FW: Letter to Phillips (Services Agreement)	Communications regarding NRA request for documents and response to same upon advice of counsel.
185	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
186	Attorney-Client	Message	8/15/2018	<madrid.jay@dorsey.com>	<Melanie-Montgomery@am.com>; <bill-winkler@am.com>; <Revan-McQueen@am.com>	<Brandon-Winkler@am.com>; <madrid.jay@dorsey.com>; <betts.gina@dorsey.com>		FW: Letter to Phillips (Fair Market Value)	Communications regarding NRA request for documents and response to same upon advice of counsel.
187	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
188	Attorney-Client	Message	8/15/2018	<madrid.jay@dorsey.com>	<Revan-McQueen@am.com>; <bill-winkler@am.com>	<Brandon-Winkler@am.com>		FW: Letter to Muller.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.
189	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
190	Attorney-Client	Message	8/15/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Bill Winkler<bill-winkler@am.com>; Revan McQueen <Revan-McQueen@am.com>	Brandon Winkler <Brandon-Winkler@am.com>; "betts.gina@dorsey.com" <betts.gina@dorsey.com>		Re: Letter to Phillips (Fair Market Value)	Communications regarding NRA request for documents and response to same upon advice of counsel.
191	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
192	Attorney-Client	Message	8/15/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Bill Winkler<bill-winkler@am.com>; Revan McQueen <Revan-McQueen@am.com>	Brandon Winkler <Brandon-Winkler@am.com>; "betts.gina@dorsey.com" <betts.gina@dorsey.com>		Re: Letter to Phillips (Fair Market Value)	Communications regarding NRA request for documents and response to same upon advice of counsel.
193	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
194	Attorney-Client	Message	8/15/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Bill Winkler<bill-winkler@am.com>; Revan McQueen <Revan-McQueen@am.com>			Re: Letter to Phillips (Fair Market Value)	Communications regarding NRA request for documents and response to same upon advice of counsel.
195	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
196	Attorney-Client	Message	8/15/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Bill Winkler<bill-winkler@am.com>; Revan McQueen <Revan-McQueen@am.com>			Re: Letter to Phillips (Fair Market Value)	Communications regarding NRA request for documents and response to same upon advice of counsel.
197	Attorney-Client	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
198	Forwarding Attorney-Client Communications	Message	8/15/2018	Bill Winkler <bill-winkler@am.com>	Angus McQueen <angus-mcqueen@am.com>	Brandon Winkler <Brandon-Winkler@am.com>		FW: Letter to Phillips (Services Agreement)	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
199	Forwarding Attorney-Client Communications	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
200	Forwarding Attorney-Client Communications	Message	8/15/2018	Angus McQueen <angus-mcqueen@am.com>	Bill Winkler <bill-winkler@am.com>	Brandon Winkler <Brandon-Winkler@am.com>		Re: Letter to Phillips (Services Agreement)	Communications regarding NRA request for documents and response to same upon advice of counsel.
201	Forwarding Attorney-Client Communications	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
202	Forwarding Attorney-Client Communications	Message	8/15/2018	Bill Winkler <bill-winkler@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>			RE: Letter to Phillips (Fair Market Value)	Communications regarding NRA request for documents and response to same upon advice of counsel.
203	Forwarding Attorney-Client Communications	Message	8/15/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Bill Winkler <bill-winkler@am.com>			Re: Letter to Phillips (Fair Market Value)	Communications regarding NRA request for documents and response to same upon advice of counsel.
204	Forwarding Attorney-Client Communications	Message_Attachment	8/15/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
205	Forwarding Attorney-Client Communications	Message	8/15/2018	Bill Winkler <bill-winkler@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>			RE: Letter to Phillips (Fair Market Value)	Communications regarding NRA request for documents and response to same upon advice of counsel.
206	Attorney-Client	Message	8/16/2018	<madrid.jay@dorsey.com>	<Melanie-Montgomery@am.com>; <bill-winkler@am.com>; <Revan-McQueen@am.com>	<madrid.jay@dorsey.com>; <betts.gina@dorsey.com>		FW: Letter - Fair Market Value Inquiry	Communications regarding NRA request for documents and response to same upon advice of counsel.
207	Attorney-Client	Message_Attachment	8/16/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
208	Attorney-Client	Message_Attachment	8/16/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
209	Forwarding Attorney-Client Communications	Message	8/16/2018	Bill Winkler <bill-winkler@am.com>	Angus McQueen <angus-mcqueen@am.com>	Brandon Winkler <Brandon-Winkler@am.com>		FW: Letter - Fair Market Value Inquiry	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
210	Forwarding Attorney-Client Communications	Message_Attachment	8/16/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
211	Forwarding Attorney-Client Communications	Message_Attachment	8/16/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
212	Attorney-Client	Message	8/17/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>; <betts.gina@dorsey.com>	<Revan-McQueen@am.com>; <Brandon-Winkler@am.com>; <Melanie-Montgomery@am.com>		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
213	Attorney-Client	Message	8/17/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; "betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
214	Attorney-Client	Message	8/17/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; "betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
215	Attorney-Client	Message	8/17/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>	<betts.gina@dorsey.com>		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
216	Attorney-Client	Message	8/17/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
217	Attorney-Client	Message	8/17/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
218	Attorney-Client	Message	8/17/2018	Bill Winkler <bill-winkler@am.com>	Revan McQueen <Revan-McQueen@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>	Angus McQueen <angus-mcqueen@am.com>		FW: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
219	Attorney-Client	Message	8/20/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie			conference call on audit letter	Communications regarding NRA request for documents and response to same upon advice of counsel.
220	Attorney-Client	Message	8/20/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie			conference call on audit letter	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
221	Attorney-Client	Message	8/20/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; "betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
222	Attorney-Client	Message	8/20/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; "betts.gina@dorsey.com" <betts.gina@dorsey.com>	Revan McQueen <Revan-McQueen@am.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
223	Attorney-Client	Message	8/20/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>			RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
224	Attorney-Client	Message	8/20/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>; "Lacey		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
225	Attorney-Client	Message	8/20/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Brandon Winkler <Brandon-Winkler@am.com>; Melanie Montgomery<Melanie-Montgomery@am.com>; "Lacey		RE: Message from KM_C368	Communications regarding NRA request for documents and response to same upon advice of counsel.
226	Forwarding Attorney-Client Communications and Work Product	Message	8/20/2018	Ashley Hackler <ashley-hackler@am.com>	Bill Winkler <bill-winkler@am.com>			FW: Letter - Fair Market Value Inquiry	Communications regarding NRA request for documents and response to same upon advice of counsel.
227	Work Product	Message_Attachment	8/20/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
228	Work Product	Message_Attachment	8/20/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
229	Attorney-Client	Message	8/21/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Ashley Hackler <ashley-hackler@am.com>		RE: Updated Letter to Brewer	Communications regarding NRA request for documents and response to same upon advice of counsel.
230	Attorney-Client	Message	8/21/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>	Ashley Hackler <ashley-hackler@am.com>		RE: Updated Letter to Brewer	Communications regarding NRA request for documents and response to same upon advice of counsel.
231	Attorney-Client	Message	8/21/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>; <ashley-hackler@am.com>			FW: Letter to Brewer.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
232	Attorney-Client	Message_Attachment	8/21/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
233	Attorney-Client	Message	8/21/2018	Bill Winkler <bill-winkler@am.com>	"madrid.jay@dorsey.com" <madrid.jay@dorsey.com>			RE: Letter to Brewer.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.
234	Attorney-Client	Message	8/21/2018	<madrid.jay@dorsey.com>	<bill-winkler@am.com>	<Melanie-Montgomery@am.com>; <Brandon-Winkler@am.com>		RE: Jay - including Melanie's input per our phone conversation.	Communications regarding NRA request for documents and response to same upon advice of counsel.
235	Attorney-Client	Message	8/22/2018	Bill Winkler <bill-winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>				Communications regarding NRA request for documents and response to same upon advice of counsel.
236	Attorney-Client	Message_Attachment	8/22/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
237	Forwarding Attorney-Client Communications	Message	8/27/2018	Revan McQueen <Revan-McQueen@am.com>	Bill Winkler <bill-winkler@am.com>			Fwd: Please Read. attorney client communication and work product.	Communications regarding NRA request for documents and response to same upon advice of counsel.
238	Forwarding Attorney-Client Communications	Message_Attachment	8/27/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
239	Forwarding Attorney-Client Communications	Message_Attachment	8/27/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
240	Work Product	Message	9/17/2018	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>	Revan McQueen <Revan-McQueen@am.com>; Angus McQueen <angus-mcqueen@am.com>	Bill Winkler <bill-winkler@am.com>; Brandon Winkler<Brandon-Winkler@am.com>		Report from this morning - ACC/AWP	Communications regarding NRA audits prepared for counsel.
241	Work Product	Message_Attachment	9/17/2018						Communications regarding NRA audits prepared for counsel.
242	Work Product	Message	9/17/2018	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>	Revan McQueen <Revan-McQueen@am.com>; Angus McQueen <angus-mcqueen@am.com>	Bill Winkler <bill-winkler@am.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie Montgomery <Melanie-Montgomery@am.com>		Re: Report from this morning - ACC/AWP	Communications regarding NRA audits prepared for counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
243	Work Product	Message_Attachment	9/17/2018						Communications regarding NRA audits prepared for counsel.
244	Work Product	Message	9/17/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>			Re: Report from this morning - ACC/AWP	Communications regarding NRA audits prepared for counsel.
245	Work Product	Message	9/18/2018	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>	Brandon Winkler <Brandon-Winkler@am.com>; Bill Winkler<bill-winkler@am.com>			for review - ACC/AWP	Communications regarding NRA audits prepared for counsel.
246	Work Product	Message_Attachment	9/18/2018						Communications regarding NRA audits prepared for counsel.
247	Work Product	Message_Attachment	9/18/2018						Communications regarding NRA audits prepared for counsel.
248	Work Product	Message_Attachment	9/18/2018						Communications regarding NRA audits prepared for counsel.
249	Work Product	Message_Attachment	9/18/2018						Communications regarding NRA audits prepared for counsel.
250	Attorney-Client	Message	9/19/2018	<betts.gina@dorsey.com>	<Revan-McQueen@am.com>; <bill-winkler@am.com>; <Brandon-Winkler@am.com>; <madrid.jay@dorsey.com>			FW: NRA / Ackerman: Video Copying, Legal Fees	Communications regarding NRA request for documents and response to same upon advice of counsel.
251	Attorney-Client	Message_Attachment	9/19/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
252	Attorney-Client	Message_Attachment	9/19/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
253	Attorney-Client	Message_Attachment	9/19/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
254	Forwarding Attorney-Client Communications	Message	9/19/2018	Ashley Hackler <ashley-hackler@am.com>	Bill Winkler <bill-winkler@am.com>			FW: Letter from Gina (Jay drafted) to Frazer yesterday	Communications regarding NRA request for documents and response to same upon advice of counsel.
255	Forwarding Attorney-Client Communications	Message_Attachment	9/19/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
256	Work Product	Message	9/20/2018	Christy DeGiusti <christy-degiusti@am.com>	Bill Winkler <bill-winkler@am.com>; "Lacey (Duffy) Cremer" <lacey-cremer@am.com>; Revan McQueen <Revan-McQueen@am.com>	Ariana Azimi <ariana-azimi@am.com>		RE: media invoices backup - ACC/AWP	Communications regarding NRA request for documents and response to same upon advice of counsel.
257	Attorney-Client	Message	9/21/2018	<betts.gina@dorsey.com>	<bill-winkler@am.com>; <revan-mcqueen@am.com>; <madrid.jay@dorsey.com>; <Brandon-Winkler@am.com>; <Melanie-Montgomery@am.com>			Fwd: NRA / Ackerman: Video Copying, Legal Fees	Communications regarding NRA request for documents and response to same upon advice of counsel.
258	Attorney-Client	Message_Attachment	9/21/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
259	Attorney-Client	Message_Attachment	9/21/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
260	Work Product	Message	9/21/2018	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>	Revan McQueen <Revan-McQueen@am.com>			<no subject>	Communications regarding NRA request for documents and response to same upon advice of counsel.
261	Work Product	Message_Attachment	9/21/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
262	Work Product	Message_Attachment	9/21/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
263	Work Product	Message_Attachment	9/21/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
264	Attorney-Client	Message	9/25/2018	<haydon.jean@dorsey.com>	<Revan-McQueen@am.com>; <bill-winkler@am.com>; <brandon-winkler@am.com>; <Melanie-Montgomery@am.com>	<madrid.jay@dorsey.com>; <betts.gina@dorsey.com>		FW: Copy of Letter.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
265	Attorney-Client	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
266	Work Product	Message	9/25/2018	Revan McQueen <Revan-McQueen@am.com>	Anthony Makris <Anthony-makris@am.com>			Fwd: Copy of Letter.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.
267	Work Product	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
268	Work Product	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
269	Work Product	Message	9/25/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>			Fwd: Copy of Letter.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.
270	Work Product	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
271	Work Product	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
272	Work Product	Message	9/25/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Nader Tavangar <nader-tavangar@am.com>			Fwd: Copy of Letter.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.
273	Work Product	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
274	Work Product	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
275	Work Product	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
276	Work Product	Message_Attachment	9/25/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
277	Work Product	Message	9/26/2018	Nader Tavangar <nader-tavangar@am.com>	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>		Past DueBackup	Communications regarding NRA request for documents and response to same upon advice of counsel.
278	Work Product	Message_Attachment	9/26/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
279	Work Product	Message	9/28/2018	Ariana Azimi <ariana-azimi@am.com>	Angus McQueen <angus-mcqueen@am.com>	Ashley Hackler <ashley-hackler@am.com>		Letter to J.Powell	Communications regarding NRA budget reductions and response to same upon advice of counsel.
280	Work Product	Message_Attachment	9/28/2018						Communications regarding NRA budget reductions and response to same upon advice of counsel.
281	Forwarding Attorney-Client Communication	Message	9/30/2018	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>			Fwd: Attorney Client Communication/Attorney Work Product	Communications regarding NRA budget reductions and response to same upon advice of counsel.
282	Work Product	Message	10/2/2018	Melanie Montgomery <melomizzou81@gmail.com>	Tony Makris <Anthony-makris@am.com>			Fwd: Letter regarding Josh Powell	Communications regarding NRA budget reductions and response to same upon advice of counsel.
283	Work Product	Message_Attachment	10/2/2018						Communications regarding NRA budget reductions and response to same upon advice of counsel.
284	Work Product	Message_Attachment	10/2/2018						Communications regarding NRA budget reductions and response to same upon advice of counsel.
285	Attorney-Client	Message	10/5/2018	Bill Winkler <bill-winkler@am.com>	Revan McQueen <Revan-McQueen@am.com>; Brandon Winkler<Brandon-Winkler@am.com>	"Gina Betts - Dorsey (betts.gina@dorsey.com)" <betts.gina@dorsey.com>; Angus McQueen <angus-mcqueen@am.com>		FW: Budget Adjustments	Communications regarding NRA budget reductions and response to same upon advice of counsel.
286	Attorney-Client	Message_Attachment	10/5/2018						Communications regarding NRA budget reductions and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
287	Work Product	Message	10/8/2018	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>			Fwd: NRA / Ackerman: Video Copying, Legal Fees	Communications regarding NRA request for documents and response to same upon advice of counsel.
288	Work Product	Message_Attachment	10/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
289	Work Product	Message_Attachment	10/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
290	Work Product	Message_Attachment	10/8/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
291	Work Product	Message	10/8/2018	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>		Re: NRA / Ackerman: Video Copying, Legal Fees	Communications regarding NRA request for documents and response to same upon advice of counsel.
292	Work Product	Message	10/8/2018	Melanie Montgomery <Melanie-Montgomery@am.com>	Anthony Makris <Anthony-makris@am.com>; Revan McQueen<Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>		Re: NRA / Ackerman: Video Copying, Legal Fees	Communications regarding NRA request for documents and response to same upon advice of counsel.
293	Work Product	Message	10/9/2018	Angus McQueen <angus-mcqueen@am.com>	Revan McQueen <Revan-McQueen@am.com>			<no subject>	Communications regarding NRA request for documents and response to same upon advice of counsel.
294	Work Product	Message_Attachment	10/9/2018						Communications regarding NRA request for documents and response to same upon advice of counsel.
295	Attorney-Client	Message	12/21/2018	<madrid.jay@dorsey.com>	<revan-mcqueen@am.com>; <SRyan@mwe.com>; <betts.gina@dorsey.com>			Fwd: NRA / Ackerman McQueen	Communications regarding NRA request for documents and response to same upon advice of counsel.
296	Work Product	Message	1/3/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>			Attorney Work Product	Communications regarding NRA request for documents and response to same upon advice of counsel.
297	Work Product	Message_Attachment	1/3/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
298	Work Product	Message_Attachment	1/3/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
299	Work Product	Message_Attachment	1/3/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
300	Work Product	Message_Attachment	1/3/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
301	Work Product	Message_Attachment	1/3/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
302	Work Product	Message_Attachment	1/3/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
303	Work Product	Message	1/3/2019	Brandon Winkler <Brandon-Winkler@am.com>	Revan McQueen <Revan-McQueen@am.com>			Attorney Work Product	Communications regarding NRA request for documents and response to same upon advice of counsel.
304	Work Product	Message_Attachment	1/3/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
305	Work Product	Message	1/4/2019	Anthony Makris <Anthony-makris@am.com>	"me@warnerloughlin.com" <me@warnerloughlin.com>			Fwd: Attorney Work Product	Communications regarding NRA request for documents and response to same upon advice of counsel.
306	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
307	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
308	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
309	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
310	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
311	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
312	Work Product	Message	1/4/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>			Fwd: Letter to Hart	Communications regarding NRA request for documents and response to same upon advice of counsel.
313	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
314	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
315	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
316	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
317	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
318	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
319	Work Product	Message	1/4/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>			FW: Letter to Hart	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
320	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
321	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
322	Work Product	Message	1/4/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>; Bill Winkler <Bill.Winkler@am.com>			Fwd: Hart Letter.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.
323	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
324	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
325	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
326	Work Product	Message_Attachment	1/4/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
327	Work Product	Message	1/7/2019	Revan McQueen <Revan-McQueen@am.com>	Anthony Makris <Anthony-makris@am.com>			Fwd: Hart Letter.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.
328	Work Product	Message_Attachment	1/7/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
329	Work Product	Message_Attachment	1/7/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
330	Work Product	Message_Attachment	1/7/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
331	Work Product	Message_Attachment	1/7/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
332	Work Product	Message	1/7/2019	Revan McQueen <Revan-McQueen@am.com>	Anthony Makris <Anthony-makris@am.com>; Angus McQueen<angus-mcqueen@am.com>			Fwd: my first exchange. Attorney work product.	Communications regarding NRA request for documents and response to same upon advice of counsel.
333	Work Product	Message	1/7/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>		Re: my first exchange. Attorney work product.	Communications regarding NRA request for documents and response to same upon advice of counsel.
334	Work Product	Message	1/7/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>		Re: my first exchange. Attorney work product. Correction	Communications regarding NRA request for documents and response to same upon advice of counsel.
335	Work Product	Message	1/8/2019	Anthony Makris <Anthony-makris@am.com>	Nader Tavangar <nader-tavangar@am.com>			Fwd: Hart Letter.pdf	Communications regarding NRA request for documents and response to same upon advice of counsel.
336	Work Product	Message_Attachment	1/8/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
337	Work Product	Message_Attachment	1/8/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
338	Work Product	Message_Attachment	1/8/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
339	Work Product	Message_Attachment	1/8/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
340	Work Product	Message	1/9/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>; Bill Winkler			FW: Attached: Draft Letter to Steve Hart/attorney work product	Communications regarding NRA request for documents and response to same upon advice of counsel.
341	Work Product	Message_Attachment	1/9/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
342	Work Product	Message	1/9/2019	Bill Winkler <bill-winkler@am.com>	Revan McQueen <Revan-McQueen@am.com>; Angus McQueen<angus-mcqueen@am.com>; Anthony			RE: Attached: Draft Letter to Steve Hart/attorney work product	Communications regarding NRA request for documents and response to same upon advice of counsel.
343	Work Product	Message_Attachment	1/9/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
344	Work Product	Message	1/10/2019	Revan McQueen <Revan-McQueen@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Angus McQueen<angus-mcqueen@am.com>; Brandon			Fwd: Letter to Hart-attorney work product	Communications regarding NRA request for documents and response to same upon advice of counsel.
345	Work Product	Message_Attachment	1/10/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
346	Work Product	Message_Attachment	1/10/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
347	Work Product	Message	1/10/2019	Revan McQueen <Revan-McQueen@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Angus McQueen<angus-mcqueen@am.com>; Brandon			Fwd: Attached Letter to Mr. Hart	Communications regarding NRA request for documents and response to same upon advice of counsel.
348	Work Product	Message_Attachment	1/10/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
349	Work Product	Message_Attachment	1/10/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
350	Work Product	Message	1/16/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>			Fwd: NRA review of records: my suggested response please approve or improve. attorney client communication	Communications regarding NRA request for documents and response to same upon advice of counsel.
351	Work Product	Message	1/16/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>			Re: NRA review of records: my suggested response please approve or improve. attorney client communication	Communications regarding NRA request for documents and response to same upon advice of counsel.
352	Work Product	Message	1/17/2019	Revan McQueen <Revan-McQueen@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Angus McQueen<angus-mcqueen@am.com>; Brandon			Fwd: Timing re NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
353	Work Product	Message	1/22/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>; Melanie			Fwd: Timing re NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.
354	Work Product	Message	1/22/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>			Re: Timing re NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.
355	Work Product	Message	1/22/2019	Revan McQueen <Revan-McQueen@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Angus McQueen<angus-mcqueen@am.com>; Brandon			Fwd: AMc response RE: timing of NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.
356	Work Product	Message	1/22/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Revan McQueen <Revan-McQueen@am.com>; Angus McQueen<angus-mcqueen@am.com>; Brandon			Re: AMc response RE: timing of NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.
357	Work Product	Message	1/23/2019	Revan McQueen <Revan-McQueen@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Angus McQueen<angus-mcqueen@am.com>; Brandon			Fwd: AMc response RE: timing of NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.
358	Work Product	Message	1/23/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>			Re: AMc response RE: timing of NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.
359	Work Product	Message	1/30/2019	Revan McQueen <Revan-McQueen@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Angus McQueen<angus-mcqueen@am.com>; Brandon			Fwd: AMc response RE: timing of NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.
360	Work Product	Message	1/30/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Revan McQueen <Revan-McQueen@am.com>; Angus McQueen<angus-mcqueen@am.com>; Brandon	"Lacey (Duffy) Cremer" <lacey-cremer@am.com>		Re: AMc response RE: timing of NRA review of records	Communications regarding NRA request for documents and response to same upon advice of counsel.
361	Work Product	Message	2/6/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-			Fwd: Ryan/Betts v.1 response RE: Document copies. Attorney client communication. For Revan's review, edits or approval.	Communications regarding NRA request for documents and response to same upon advice of counsel.
362	Work Product	Message	2/6/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>			Re: Ryan/Betts v.1 response RE: Document copies. Attorney client communication. For Revan's review, edits or approval.	Communications regarding NRA request for documents and response to same upon advice of counsel.
363	Work Product	Message	2/7/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>			Fwd: Interim response to NRA re: AMc document copies.	Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
364	Work Product	Message	2/7/2019	Revan McQueen <Revan-McQueen@am.com>	Anthony Makris <Anthony-makris@am.com>			FW: Privileged communication 4.	Communications regarding NRA request for documents and response to same upon advice of counsel.
365	Work Product	Message	2/7/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>			Re: Privileged communication 4.	Communications regarding NRA request for documents and response to same upon advice of counsel.
366	Forwarding Attorney-Client Communications	Message	2/12/2019	Revan McQueen <Revan-McQueen@am.com>	Brandon Winkler <Brandon-Winkler@am.com>; Bill Winkler<bill-winkler@am.com>			Fwd: Ackerman letter to NRA	Communications regarding NRA request for documents and response to same upon advice of counsel.
367	Forwarding Attorney-Client Communications	Message_Attachment	2/12/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
368	Forwarding Attorney-Client Communications	Message_Attachment	2/12/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
369	Work Product	Message	2/12/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>			Fwd: Ackerman letter to NRA	Communications regarding NRA request for documents and response to same upon advice of counsel.
370	Work Product	Message_Attachment	2/12/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
371	Work Product	Message_Attachment	2/12/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
372	Work Product	Message	3/6/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Ariana Azimi <ariana-azimi@am.com>			FW: [BULK] PLEASE PASS TO MILLIE	Communications regarding NRA request for documents and response to same upon advice of counsel.
373	Work Product	Message_Attachment	3/6/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
374	Work Product	Message_Attachment	3/6/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
375	Work Product	Message	3/6/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Ariana Azimi <ariana-azimi@am.com>			FW: North Videos	Communications regarding NRA request for documents and response to same upon advice of counsel.
376	Work Product	Message_Attachment	3/6/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
377	Attorney-Client	Message_Attachment	3/7/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
378	Work Product	Message	3/7/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>			Attorney Work Product	Communications regarding NRA request for documents and response to same upon advice of counsel.
379	Work Product	Message_Attachment	3/7/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
380	Work Product	Message_Attachment	3/7/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
381	Work Product	Message	3/7/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Ariana Azimi <ariana-azimi@am.com>			Re: Past North Travel & Videos	Communications regarding NRA request for documents and response to same upon advice of counsel.
382	Work Product	Message	3/7/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Ariana Azimi <ariana-azimi@am.com>			For RM	Communications regarding NRA request for documents and response to same upon advice of counsel.
383	Work Product	Message_Attachment	3/7/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
384	Work Product	Message	3/7/2019	Ariana Azimi <ariana-azimi@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>			Fw: Documents for GB	Communications regarding NRA request for documents and response to same upon advice of counsel.
385	Work Product	Message	3/12/2019	Revan McQueen <Revan-McQueen@am.com>	Anthony Makris <Anthony-makris@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>			Fwd: On behalf of Jay Madrid	Communications regarding concerns about Brewer leaking information to media prepared for counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
386	Work Product	Message_Attachment	3/12/2019						Communications regarding concerns about Brewer leaking information to media prepared for counsel.
387	Work Product	Message_Attachment	3/12/2019						Communications regarding concerns about Brewer leaking information to media prepared for counsel.
388	Work Product	Message_Attachment	3/12/2019						Communications regarding concerns about Brewer leaking information to media prepared for counsel.
389	Work Product	Message_Attachment	3/12/2019						Communications regarding concerns about Brewer leaking information to media prepared for counsel.
390	Work Product	Message_Attachment	3/12/2019						Communications regarding concerns about Brewer leaking information to media prepared for counsel.
391	Work Product	Message_Attachment	3/12/2019						Communications regarding concerns about Brewer leaking information to media prepared for counsel.
392	Work Product	Message	3/12/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>	Bill Winkler <bill-winkler@am.com>; Brandon Winkler<Brandon-Winkler@am.com>; Melanie Montgomery <Melanie-Montgomery@am.com>		Re: On behalf of Jay Madrid	Communications regarding concerns about Brewer leaking information to media prepared for counsel.
393	Work Product	Message	3/12/2019	Revan McQueen <Revan-McQueen@am.com>	Revan McQueen <Revan-McQueen@am.com>			AWP/ACC	Communications regarding concerns about Brewer leaking information to media prepared for counsel.
394	Work Product	Message	3/12/2019	Revan McQueen <Revan-McQueen@am.com>	Ariana Azimi <ariana-azimi@am.com>			Please print 3 copies.	Communications regarding concerns about Brewer leaking information to media prepared for counsel.
395	Work Product	Message_Attachment	3/12/2019						Communications regarding concerns about Brewer leaking information to media prepared for counsel.
396	Work Product	Message	3/12/2019	Revan McQueen <Revan-McQueen@am.com>	Ariana Azimi <ariana-azimi@am.com>			3 copies	Communications regarding concerns about Brewer leaking information to media prepared for counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
397	Work Product	Message_Attachment	3/12/2019						Communications regarding concerns about Brewer leaking information to media prepared for counsel.
398	Work Product	Message	3/13/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>; Angus McQueen<angus-mcqueen@am.com>		Re: On behalf of Jay Madrid	Communications regarding concerns about Brewer leaking information and advice of counsel regarding same.
399	Work Product	Message	3/13/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>; Angus McQueen <angus-mcqueen@am.com>		Re: On behalf of Jay Madrid	Communications regarding concerns about Brewer leaking information and advice of counsel regarding same.
400	Work Product	Message	3/13/2019	Anthony Makris <Anthony-makris@am.com>	Melanie Montgomery <Melanie-Montgomery@am.com>	Revan McQueen <Revan-McQueen@am.com>; Angus McQueen <angus-mcqueen@am.com>		Re: On behalf of Jay Madrid	Communications regarding concerns about Brewer leaking information and advice of counsel regarding same.
401	Work Product	Message	3/14/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Anthony Makris <Anthony-makris@am.com>			Fwd: NRA's response letter to Jay Madrid	Communications regarding concerns about Brewer leaking information and advice of counsel regarding same.
402	Work Product	Message_Attachment	3/14/2019						Communications regarding concerns about Brewer leaking information and advice of counsel regarding same.
403	Forwarding Attorney-Client Communications	Message	3/25/2019	Revan McQueen <Revan-McQueen@am.com>	Brandon Winkler <Brandon-Winkler@am.com>; Bill Winkler<bill-winkler@am.com>			Fw: NRA demands further contract review. note is privileged and confidential.	Communications regarding NRA request for documents and response to same upon advice of counsel.
404	Forwarding Attorney-Client Communications	Message_Attachment	3/25/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
405	Attorney-Client	Message	4/2/2019	<betts.gina@dorsey.com>	<sryan@mwe.com>; <madrid.jay@dorsey.com>; <revan-mcqueen@am.com>; <angus-mcqueen@am.com>; <bill-winkler@am.com>;			Fwd: Confidentiality Agreement	Communications regarding NRA request for documents and response to same upon advice of counsel.
406	Work Product	Message	4/5/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Anthony Makris<Anthony-makris@am.com>; Brandon Winkler <Brandon-Winkler@am.com>			Fwd: 4/2 E-mail re: NDA	Communications regarding NRA request for documents and response to same upon advice of counsel.
407	Work Product	Message_Attachment	4/5/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
408	Work Product	Message_Attachment	4/5/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
409	Work Product	Message	4/5/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Anthony Makris <Anthony-Makris@am.com>			Fwd: 4/2 E-mail re: NDA	Communications regarding NRA request for documents and response to same upon advice of counsel.
410	Work Product	Message_Attachment	4/5/2019						Communications regarding NRA request for documents and response to same upon advice of counsel.
411	Attorney-Client	Message	4/8/2019	Revan McQueen <Revan-McQueen@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; "madrid.jay@dorsey.com" <madrid.jay@dorsey.com>;			FW: Request for NRATV data	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
412	Attorney-Client	Message	4/9/2019	Revan McQueen <Revan-McQueen@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; "madrid.jay@dorsey.com" <madrid.jay@dorsey.com>;	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>;		Fwd: Request for NRATV data	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
413	Attorney-Client	Message	4/9/2019	Revan McQueen <Revan-McQueen@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; "madrid.jay@dorsey.com" <madrid.jay@dorsey.com>;	Angus McQueen <angus-mcqueen@am.com>; Bill Winkler <bill-winkler@am.com>; Brandon Winkler <Brandon-Winkler@am.com>;		Fwd: Request for NRATV data	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
414	Attorney-Client	Message	4/9/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; "madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; "SRyan@mwe.com" <SRyan@mwe.com>;		Re: Request for NRATV data	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
415	Attorney-Client	Message	4/9/2019	Anthony Makris <Anthony-makris@am.com>	Revan McQueen <Revan-McQueen@am.com>	"betts.gina@dorsey.com" <betts.gina@dorsey.com>; "madrid.jay@dorsey.com" <madrid.jay@dorsey.com>; "SRyan@mwe.com" <SRyan@mwe.com>;		Re: Request for NRATV data	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
416	Work Product	Message	4/9/2019	Ariana Azimi <ariana-azimi@am.com>	Angus McQueen <angus-mcqueen@am.com>			FW: FOR RM REVIEW	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
417	Work Product	Message	4/9/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>			Fwd: FOR RM REVIEW -- REVISED	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
418	Work Product	Message	4/9/2019	Revan McQueen <Revan-McQueen@am.com>	Angus McQueen <angus-mcqueen@am.com>			Fwd: REVISED (3)	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.

#	Privilege Type	RecordType	Document Date	Email From	Email To	Email CC	Email BCC	Email Subject	Privilege Description
419	Work Product	Message	4/9/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Henry Martin <henry-martin@am.com>			FW: FOR RM REVIEW -- REVISED	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
420	Work Product	Message	4/9/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Henry Martin <henry-martin@am.com>			FW: REVISED (3)	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.
421	Work Product	Message	4/10/2019	Melanie Montgomery <Melanie-Montgomery@am.com>	Angus McQueen <angus-mcqueen@am.com>	Revan McQueen <Revan-McQueen@am.com>		Re: Request for NRATV data	Communications regarding NRA request for information related to NRATV and response to same upon advice of counsel.

EXHIBIT A-4



BRIAN E. MASON
Partner
(214) 981-9929
mason.brian@dorsey.com

July 7, 2021

Via email

Sarah Rogers
Philip J. Furia
Jason Clouser
Brewer Attorneys & Counselors
750 Lexington Avenue, 14th Floor
New York, New York 10022

P. Kent Correll, Esq.
102 E. 10th Street
New York, New York 10003

Re: *National Rifle Association of America (“NRA”) v. Ackerman McQueen, Inc. (“AMc”), et al.*, No. 3:19-cv-02074 (N.D. Tex.); Depositions

Dear Counsel,

I am writing to follow up on the parties’ prior correspondence and discussions regarding the scheduling of depositions.

First, as you know, we served a notice of deposition for Mr. Tedrick on June 10, 2021. We then followed up on June 16, 2021 asking whether Mr. Tedrick was available on July 13, 2021. We were then told Mr. Tedrick was not available. Since that time, we have repeatedly requested alternative dates for Mr. Tedrick’s deposition, but have received no available dates. Once again, please advise as to when Mr. Tedrick is available for his deposition.

Second, in my June 16, 2021 correspondence and based on the NRA’s concerns with our service of a third-party subpoena on Mrs. Brewer, we requested that the Brewer Firm accept service on behalf of Mr. Brewer. Since that time, we have discussed Mr. Brewer’s deposition during a meet and confer and repeatedly asked whether the Brewer Firm is willing to accept service on his behalf. We have similarly received no response. Enclosed is the third-party subpoena for Mr. Brewer. Once again, we request a response as to whether you will accept service of the third party subpoena. We will obviously work with the parties on alternative dates if the noticed date poses a conflict.

APP000050

Third, enclosed is AMc's Notice of Deposition for the NRA's corporate representative(s). If the noticed date does not work, then please advise as soon as possible so that we find an alternative date that works for all parties.

Fourth, AMc would like to schedule the depositions of the NRA and Mr. LaPierre's experts. We would ask that you please provide dates of their availability.

Fifth, the NRA previously requested the depositions of Mr. Tavangar, Mr. Darley, and an AMc corporate representative. In my June 16, 2021 correspondence, I advised that Mr. Darley and/or counsel were not available on June 23, 2021. I then provided alternative dates of July 1, July 6, July 7, and July 8. Given that we received no confirmation as to these dates, they have now either passed or are no longer available. Further, I advised in my June 16, 2021 correspondence that Mr. Tavangar and/or counsel was not available on June 21, 2021, but offered June 25, July 6, July 7, July 8, and July 9 as alternative dates. Similar to Mr. Darley, we have received no confirmation from the NRA as to these dates that have now either passed or are no longer available. Mr. Darley's and Mr. Tavangar's additional availability is set forth below.

Sixth, on July 2, 2021, we received a request from the NRA to take the depositions of Tony Makris, Bill Winkler, Melanie Montgomery, Revan McQueen, Nadar Tavangar, Lacey Duffy, and Brandon Winkler. Regarding Mr. Duffy, she is no longer an employee of AMc, and therefore, we do not have the ability to control or compel her attendance at a deposition. Below is the availability for the other witnesses as of today. Please be sure each of these depositions are noticed for Dorsey's Dallas Office, whether in person or by zoom.

Witness	Availability for Deposition
Bill Winkler	July 13-14; July 20-23; July 27-30
Brandon Winkler	July 13-14; July 20-23; July 27-30
Revan McQueen	July 14; July 20-23
Melanie Montgomery	July 13-14; July 20-23; August 3-5
Tony Makris	August 3-6
Nader Tavangar	July 13-14; July 20-22; July 27-30; August 3-6
Brian Darley	July 20-23; July 27-30; August 3-6

Seventh, subject to certain objections AMc will be serving, Ms. Montgomery, Mr. Winkler, and Mr. Darley will be AMc's corporate representatives. We would recommend that these witnesses corporate representative testimony be taken at the same scheduled time as their individual depositions, similarly to how the parties conducted certain depositions during the NRA Bankruptcy.

Finally, we understand there was a request to confer on deposition dates and scheduling. We are of course willing to confer with all parties, but would ask that we do it as soon as practicable given the upcoming depositions that will be taking place.

Thank you for your attention to these issues. I would be glad to confer further, if needed.

Sincerely,
DORSEY & WHITNEY LLP

/s/ Brian E. Mason

Brian E. Mason
Partner

cc: G. Michael Gruber
Kelsey M. Taylor
Christina M. Carroll

EXHIBIT A-5

Taylor, Kelsey

From: Sarah Rogers <sbr@BrewerAttorneys.com>
Sent: Monday, July 19, 2021 7:26 PM
To: Mason, Brian
Cc: Philip Furia; Jason Clouser; Taylor, Kelsey
Subject: RE: Meet/Confer

EXTERNAL: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Brian,

Further to the below, assuming the parties are able to agree on a scope for the deposition of Susan Dillon, she is available for a video deposition on July 28th. Expert availability is as follows:

- Hochman: 08/9 – 08/13
- Goolsby: Due to a conflicting proceeding, Goolsby is not available until the third week of August
- Buss: 08/02 – 08/06
- Mclean: 08/02 – 08/06
- Klink: 08/09, 8/10, 08/12, 08/13
- Kraus: 08/10-08/12, 08/18, 08/19
- Kanter: 08/09-08/12

Regards,
Sarah

From: Sarah Rogers <sbr@BrewerAttorneys.com>
Sent: Saturday, July 17, 2021 7:36 PM
To: mason.brian@dorsey.com
Cc: Philip Furia <pjf@brewerattorneys.com>; Jason Clouser <jfc@brewerattorneys.com>; Taylor.Kelsey@dorsey.com
Subject: Re: Meet/Confer

Brian,

The NRA responds as follows:

Depositions

Regarding Mr. Darley, you're correct that our prior email contained a typo -- apologies. However, upon further consideration and in light of the court's recent ruling on Mr. LaPierre's MTD, the NRA modifies its slate of noticed depositions as follows:

- We no longer require a deposition of Brian Darley.
- We do wish to depose Ed Martin, Henry Martin, and Bill Powers -- please provide their availability.
- We intend to notice Nader Tavangar for 8/4.
- We are not able to proceed with Bill Winkler this Tuesday. Since it appears he is no longer available on other dates, we reserve the right to specify another witness and will do so shortly.

In addition, we decline to combine 30(b)(6) depositions with fact depositions of the same designees. Instead, we request a single date on which Ackerman's 30(b)(6) designee(s) will be available for a single seven-hour deposition. The NRA will make its own designee(s) available for a seven-hour virtual deposition on the date you have noticed, July 27th.

Given that Mr. LaPierre is no longer a party to the case, we no longer require dates for his experts. However, we will provide deposition availability for the NRA's experts by Monday.

As discussed during our prior meet/confer, we do not believe Ackerman has explained, or can show, why a deposition of the NRA's outside litigation counsel in this matter is necessary or appropriate. The fact that Ackerman separately seeks a deposition of counsel's wife further underscores the harassing nature of this request.

Regarding Susan Dillon, we did confer regarding the scope of the deposition -- in particular, the NRA requested that Ackerman specify topics for its examination, including so the parties could plan ahead to avoid or minimize privilege complications. We still await these topics. In the meantime -- on the assumption an agreement can be reached regarding scope -- we will provide potential dates for Ms. Dillon by Monday.

Summary Judgment

The NRA has no intention of seeking a trial continuance on the basis of the one-week briefing extension discussed here, and will note the parties' agreement on the same in our submission to the Court. We do not address your other accusations (e.g. "scheme to scuttle"), except to note that they are inaccurate. We are trying to coordinate in good faith with Ackerman to calendar outstanding discovery within a short timeframe.

Protective Order

We confirm our availability to meet and confer on a response if, and when, Ackerman amends its recent RFPs to indicate what, if any, bankruptcy materials it believes are relevant to the claims and defenses in this case. In the meantime, please certify that Ackerman has complied with Paragraph 13.1 of the Bankruptcy Court's protective order.

Regards,
Sarah

From: mason.brian@dorsey.com <mason.brian@dorsey.com>

Sent: Thursday, July 15, 2021 10:05 PM

To: Sarah Rogers <sbr@BrewerAttorneys.com>

Cc: Philip Furia <pjif@brewerattorneys.com>; Jason Clouser <jfc@brewerattorneys.com>; Taylor.Kelsey@dorsey.com <Taylor.Kelsey@dorsey.com>

Subject: RE: Meet/Confer

Sarah,

Below are responses to the issues you raised.

Depositions

Regarding the deposition dates, thank you for confirming Mr. Tedrick for August 2. We have confirmed Mr. Hart is available for July 26 and will send an amended notice. Regarding Mr. Darley, did you mean July 27 instead of August 27? I will confirm that that date still works. Regarding Brandon Winkler, I can confirm July 30, but we will need to begin that deposition at 8:00 am central time. As for Bill Winkler's deposition, once we received confirmation that your preference for his deposition was July 20, we immediately confirmed that date, which required numerous people to move their schedules around and make travel arrangements. Bill is no longer available on July 29.

Concerning the expert depositions, we asked for the NRA to provide us with dates in my July 7 correspondence. We have still not received a single date for any one of the NRA or Mr. LaPierre's experts. During our meet and confer on Tuesday, it appeared as though there has not even been any communication with your experts as to dates and availability. As you know, the litigation between our clients has been pending since April 2019. The NRA's bankruptcy filing effectively stayed this entire litigation for five months. The NRA has already asked for a six-month continuance, which was granted in part when the Court moved the trial setting back three weeks to October 4. The NRA also recently asked for the summary judgment deadline to be moved, which the Court denied. This request further confirmed the NRA's interest in continuing this case once again. AMc is not agreeable to another trial continuance. We understand that there is a lot of discovery activity going on right now and over the course of the next few weeks, but it is our position that this situation was created solely by the actions (and inactions) of the NRA. Further, there will undoubtedly be motion practice with respect to the NRA and Mr. LaPierre's experts. It is important that these depositions get completed as soon as possible in accordance with the Court's scheduling order, as amended.

With that said, we request that you provide us with dates for the NRA and Mr. LaPierre's experts' availability immediately. If some of those dates happen to spill over the August 6 discovery deadline, we are willing to discuss taking certain depositions after the deadline. However, we will not agree to a blanket extension of the discovery deadline or to conduct all expert discovery in August as we believe that will potentially prejudice the October 4 trial setting and the Court's ability to decide issues relating to same.

I also write to reiterate our request for a response to Mr. Brewer's deposition. As you may recall, the NRA complained about AMc serving Mrs. McQueen without first conferring or trying to see if the Brewer Firm would accept service. We have since asked you on at least five separate occasions whether you will accept service for Mr. Brewer's deposition, and we also conferred about the topics of his deposition in response to your request for such conference. We have yet to receive a response about accepting service. As a result, we are preparing to bring this issue to Magistrate Toliver pursuant to her discovery protocol and would ask that the NRA begin preparing its opposition to AMc's motion to compel.

Finally, we similarly previously asked if you would accept service of a subpoena for Ms. Dillon. We also conferred on the intended scope of that deposition. Please provide us with deposition dates for Ms. Dillon no later than Monday, July 19, 2021. If you are not willing to accept a subpoena on her behalf, please immediately so that we can take the issue up with the Court.

Summary Judgment

In the Court's original scheduling order, the Court set the parties' deadline to file summary judgments more than 30 days before the discovery deadline. The Court further made clear in his scheduling order that the parties had 21 days to file responses to same. As discussed above, it is our position that the request to conduct discovery prior to responding to AMc's motion for summary judgment is improper and not in keeping with the scheduling order, and the present time constraints are the direct result of the NRA's dilatory actions. It appears the NRA continues to take actions consistent with an overall scheme to scuttle the current trial setting and that the NRA lacks a good faith effort in preparing for trial. In fact, setting aside the discovery in the bankruptcy case, since the deposition of John Popp, which occurred *two years* ago on July 15, 2019, the NRA has not deposed a single AMc representative.

With that said, AMc will agree to a one-week extension of the NRA's response deadline until Monday, August 2, 2021 upon the following two conditions: (1) the NRA agrees not to oppose a one-week extension of AMc's reply deadline, if requested; and (2) the certificate of conference in the NRA's motion for leave makes clear that AMc is only agreeable to the requested extension if it is not used as a basis to support a request by the NRA to continue the trial setting, to which the NRA is agreeable.

Protective Order

Pursuant to our prior discussions, we are in the process of identifying categories of documents that we believe are relevant to the claims and defenses in this suit. We will provide you with separate correspondence on this particular issue.

Let us know if we need to discuss any of these issues further.

Brian E. Mason

Partner

DORSEY & WHITNEY LLP
300 Crescent Ct, Suite 400 | Dallas, TX 75201
P: 214.981.9929 F: 214.981.9901 C: 214.675.6002

From: Sarah Rogers <sbr@BrewerAttorneys.com>
Sent: Thursday, July 15, 2021 7:59 AM
To: Mason, Brian <mason.brian@dorsey.com>
Cc: Philip Furia <pjf@brewerattorneys.com>; Jason Clouser <jfc@brewerattorneys.com>; Taylor, Kelsey <Taylor.Kelsey@dorsey.com>
Subject: Meet/Confer

EXTERNAL: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Brian,

Further to our meet/confer call Tuesday, I write with the following additional dates and items:

Deposition Dates

We are able to confirm Rick Tedrick's availability for a remote video deposition on Monday 8/2. We would like to schedule Brian Darley for 8/27 and Brandon Winkler for 7/30. In addition, you previously noted Bill Winkler's availability for multiple dates, and we indicated a preference for 7/20. However, if Mr. Winkler also remains available on 7/29, please let us know -- that date may ultimately work better for us.

We also note the need to calendar depositions for a number of experts. If you are amenable to having these depositions extend past the August 6, 2021, cutoff, please let us know, since this creates additional scheduling possibilities.

Summary Judgment Briefing

In view of the demands of upcoming depositions, we ask that Ackerman consent to a two-week extension of the deadline for the NRA's opposition to its MSJ (from 7/27 to 8/10). Obviously, we would consent to a commensurate extension for Ackerman's reply.

Protective Order

As we emphasized during yesterday's call, Ackerman must comply with the bankruptcy court's protective order. In the spirit of good faith and in light of the demanding schedule with which all parties and counsel have contended, if Ackerman agrees to the MSJ briefing extension outlined above, then we confirm that we are willing to extend Ackerman's deadline for compliance with the protective order until this Friday, July 16th - or Monday, July 19 if preferred.

Regards,

Sarah

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EXHIBIT A-6

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EXHIBIT A-7

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EXHIBIT A-8

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EXHIBIT A-9

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EXHIBIT A-10

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EXHIBIT A-16

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EXHIBIT A-17

FILED UNDER SEAL

EXHIBIT A-18

FILED UNDER SEAL

EXHIBIT A-19

B R E W E R
ATTORNEYS & COUNSELORS

October 15, 2021

VIA EMAIL

Brian Mason, Esq.
Dorsey & Whitney LLP
300 Crescent Court, Suite 400
Dallas, TX 75201

Re: *National Rifle Association of America v. Ackerman McQueen, Inc., et al.*, No.
3:19-cv-02074 (N.D. Tex.)

Counsel:

On behalf of Plaintiff the National Rifle Association of America (the “NRA”) in the above-captioned matter, I write in response to your letter dated October 12, 2021, regarding the NRA’s privilege log. Contrary to the statement in your letter, these are not “lingering issues”—the majority are being raised by Defendants now, for the first time, two weeks before the already-extended discovery deadline. Nonetheless, the NRA is responding promptly.¹

1. Work Product Assertions: Identifying the Anticipated Litigation

There is no authority for the proposition that the NRA must specify which lawsuit(s) it anticipated in connection with each entry where work product protection is asserted. The NRA requested weeks ago that AMc clarify this issue in connection with its own privilege log because: (i) AMc asserted work product for dozens of entries without alleging *any anticipation of litigation at all*; and (ii) AMc alleges that the prospect of litigation was concealed from it, rendering its assertion of work product protection implausible. In addition, while it is a matter of public record that the NRA confronted multiple pending and threatened legal matters during relevant years that involved some of the same subject matter as this case, it is difficult to imagine why AMc would prepare documents “in anticipation of litigation” on the dates, and concerning the subject matter, listed on its privilege log—unless AMc anticipated litigation against the NRA, which AMc denies. For example, AMc seemingly asserts that it prepared documents “in anticipation of litigation”:

- On March 28, 2018, regarding Brewer’s information requests;²
- On August 20, 2018, regarding the “fair market value” provisions of the NRA-AMc Services Agreement;³

¹ This contrasts with AMc’s ongoing delay in redressing issues with its own privilege log, which it promised to amend more than a week ago.

² See AMc Amended Privilege Log, entry no. 006.

³ See AMc Amended Privilege Log, entry no. 226.

October 15, 2021

Page 2

- On September 17, 2018, regarding the record examination conducted that morning;⁴
- On September 20, 2018, regarding backup for media invoices;⁵ and
- On September 25, 2018, regarding the NRA's requests for documents.⁶

In contrast to Defendants—whose document production continues to exhibit significant, troubling date-range and subject-matter gaps, including as set forth in our prior letters⁷—the NRA delivered tens of thousands of responsive documents before the scheduled close of discovery in this case⁸ and privilege-logged thousands more. AMc's recent demand that the NRA revise its privilege log to state which litigation it anticipated in connection with each work-product assertion is unduly burdensome and unsupported by any law. Nonetheless, to further enable Defendants and the Court to assess the NRA's claims of privilege, the NRA refers to the following legal matters that were pending and anticipated at relevant times, for which relevant documents are logged:

- *People of the State Of New York, by Letitia James, Attorney General of the State of New York v. the National Rifle Association of America, Inc., et al.*, Index No. 451625/2020 (N.Y. Comm. Div. 2020). This lawsuit was preceded by an investigation and by earlier public threats from Letitia James;⁹
- *In re. National Rifle Association of America*. New York Department of Financial Services, Case No. 2020-0003-C, preceded by an investigation formally commenced October 2017;
- *NRA v. Lockton Affinity Series of Lockton Affinity, LLC, et al.*, Case 1L18-ch-00639 (E.D. Va. 2018);

⁴ See AMc Amended Privilege Log, entry no. 240.

⁵ See AMc Amended Privilege Log, entry no. 256.

⁶ See AMc Amended Privilege Log, entry no. 266.

⁷ See, e.g., Letter from S. Rogers to B. Mason dated Oct. 1, 2021 (discussing document production gaps); Letter from S. Rogers to B. Mason dated Sep. 22, 2021 (listing subject-matter categories for which few or no documents were produced or logged); Letter from S. Rogers to B. Mason dated Aug. 25, 2021 (listing categories of "missing" documents).

⁸ As of as of July 1, 2021, the NRA had produced 59,750 documents. Since that date, Defendants have produced 12 additional volumes—and "dumped" hundreds of thousands of records on the NRA after the scheduled close of discovery, with only weeks remaining for the NRA to review and make use of them.

⁹ See, e.g., July 12, 2018, Tish James for Attorney General Press Release, <https://www.tishjames2018.com/press-releases/2018/7/12/taking-on-the-scurge-of-gun-violence-and-keeping-new-yorkers-safe/>. AMc knew that the NRA anticipated litigation with New York state regulators concerning the NRA/AMc relationship at relevant times, because AMc's executives rebuffed requests for documents and transparency that explicitly invoked this risk. See, e.g., AMcTX-00010667. Indeed, on August 22, 2018, AMc's outside counsel warned the NRA that it should not want copies of records kept by AMc, lest New York regulators subpoena them. See AMcTX-00065340.

October 15, 2021

Page 3

- *Kapoor v. NRA*, Case No. 1:18-cv-1320 (E.D. Va. 2018);
- *National Rifle Association of America v. Cuomo, et al.*, 18-CV-00566-TJM-CFH (N.D.N.Y. 2018);
- Sexual harassment litigation threatened by Melanie Montgomery in October 2018;
- *Dell'Aquila v. Wayne LaPierre, the National Rifle Association of America, and the NRA Foundation, Inc.*, Case No. 3:19-cv-00679 (M.D. Tenn. 2019);
- *Former Officer (Confidential) v. National Rifle Association of America*. Employment claims arbitration commenced September 2019; and
- *National Rifle Association of America v. Dycio*, Case No. 2019-17571 (Va, Fairfax Cty. 2019).

The NRA notes that the foregoing list is not exhaustive, and is prepared solely to aid the interpretation of the privilege log served by the NRA in this case. If there are particular privilege-log entries about which AMc seeks additional information, please me know.

2. Names Associated With “Personal” Email Addresses

The NRA declines to undertake the burden of annotating each and every “personal email address” in its privilege log to identify relevant person(s). The illustrative “personal” email address identified in AMc’s letter belongs to an outside law firm, Spyros Counsel. The other entries you identify consist of emails involving: (i) Calvin Coolidge, who provided administrative support to Lt. Col. North;¹⁰ (ii) Julie Golob,¹¹ an NRA director whose identity and contact information were known to AMc¹² when AMc sent its October 12, 2021, letter claiming to be confused by her email address; and (iii) Pete Brownell, a former NRA director and officer.¹³

3. Employee “Functional Equivalents”

AMc also demands that the NRA annotate and explain, for each of its privilege log entries to which the “functional equivalent” doctrine applies, the identities of relevant AMc employees and the jobs they were performing.¹⁴ However, this information is as readily

¹⁰ NRA-AMc_00163802.

¹¹ NRA-AMc_00176538

¹² Indeed, AMc produced dozens of documents reflecting its own correspondence with Ms. Golob at the same email address. A few examples may be found at: AMcTX-00272122; AMcTX-00271377; and, AMcTX-00001550, an email addressed to Ms. Golub in her capacity as an NRA director.

¹³ NRA-AMc_00181011.

¹⁴ Although each of the 154 entries challenged by AMc involves AMc itself, four entries also involve Membership Marketing Partners (“MMP”) personnel Gurney Sloan and Peyton Knight. As AMc knows, Mr. Sloan and Mr. Knight worked with the NRA and AMc to develop and disseminate communications to NRA members regarding Carry Guard.

October 15, 2021

Page 4

available to AMc as to the NRA. **Indeed, AMc already has copies of the documents about which it claims to require more information.** The NRA notes, moreover, that the “functional equivalent” exception to waiver need not be alleged on a basis specific to individual employees.¹⁵ The NRA also notes that it previously provided an affidavit from its general counsel concerning AMc’s “functional equivalent” role, and refers AMc to the Affidavit of John Frazer filed at NYSCEF No. 26 in Case No. 451825/2019 (N.Y. Sup. 2019), to which Ackerman was party.

4. Documents Logged as “Not Privileged”

Certain documents contained on the NRA’s privilege log are neither individually privileged (on a standalone basis) nor responsive to discovery in this matter, but are attached to document “families” containing responsive, privileged material and are logged to provide information about the full context (the full “family”) associated with each privileged document. However, the NRA notes that the nonresponsive, nonprivileged nature of many of these documents should be readily apparent from their filenames, which the privilege log already discloses. For example, the very first document disputed in your letter is NRA-AMc_00162747, an email attachment with the filename “ATT00002.htm;” this is a “generic attachment data” artifact commonly generated by Microsoft Exchange. Nonetheless, NRA’s amended log will clarify the descriptions provided for these “Not Privileged” records.

The NRA reserves all rights, and waives none.

Sincerely,



Sarah B. Rogers

¹⁵ See, e.g., *In re Copper Mkt. Antitrust Litig.*, 200 F.R.D. 213, 216 (S.D.N.Y. 2001) (holding that a public relations firm was, as a whole, “the functional equivalent of an in-house public relations department;” therefore, privilege was preserved during communications with the firm).

EXHIBIT A-20



BRIAN E. MASON
Partner
(214) 981-9929
mason.brian@dorsey.com

October 22, 2021

Via email

Sarah B. Rogers
Cecelia Fanelli
Brewer Attorneys & Counselors
750 Lexington Avenue, 14th Floor
New York, New York 10022

Re: *National Rifle Association of America (“NRA”) v. Ackerman McQueen, Inc. (“AMc”), et al.*, No. 3:19-cv-02074 (N.D. Tex.); AMc’s Second Amended Privilege Log

Dear Counsel,

At the NRA’s request, enclosed with this letter is AMc’s Second Amended Privilege Log. The NRA has raised issues with respect to AMc’s prior logs, namely that it does not provide a sufficient amount of detail to ascertain the privilege and that certain documents appear to be missing.

Regarding the descriptions, AMc is confident this amended log meets, if not exceeds, AMc’s obligations under Fifth Circuit law and clearly sets forth the basis for privilege of each document identified therein. Moreover, AMc’s Second Amended Privilege Log clarifies for which entries documents are withheld as work product prepared in anticipation of litigation in the same manner as the NRA reflected its designations of work product. As you have previously requested, and to enable the NRA and the Court to assess AMc’s claims of work product privilege, AMc refers to the following matters for which relevant documents are logged on the basis of work product privilege:¹

- *NRA v. Lockton Affinity Series of Lockton Affinity, LLC, et al.*, Case 1:18-ch-00639 (E.D. Va. 2018);
- *NRA v. Andrew Cuomo, et al.*, Case 18-CV-00566 (N.D.N.Y. 2018);

¹ Certain documents withheld on the basis of the work product doctrine were withheld on the basis of multiple matters.

October 22, 2021

Page 2

- *People of the State Of New York, by Letitia James, Attorney General of the State of New York v. the National Rifle Association of America, Inc., et al.*, Index No. 451625/2020 (N.Y. Comm. Div. 2020); and
- AMc anticipated litigation being brought by the NRA against AMc, including in large part due to the threats made by the NRA's counsel, Bill Brewer, to AMc.

Regarding the documents, AMc went back to confirm that all documents withheld on the basis of privilege were properly logged. During the course of that review, AMc first learned that certain documents were inadvertently not included on its Original Privilege Log. The enclosed Second Amended Privilege Log includes these documents.

Should you have any questions or concerns, please feel free to contact me.

Sincerely,

DORSEY & WHITNEY LLP

/s/ *Brian E. Mason*

Brian E. Mason
Partner

cc: G. Michael Gruber
Kelsey M. Taylor
Christina M. Carroll

EXHIBIT A-21

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